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9 *Attorneys for Defendants Meta Platforms, Inc.;*
10 *Facebook Holdings, LLC; Facebook*
11 *Operations, LLC; Facebook Payments, Inc.;*
12 *Facebook Technologies, LLC; Instagram, LLC;*
13 *and Siculus, Inc.*

14 *Additional parties and counsel listed on*
15 *signature pages*

16
17 **UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
19 **OAKLAND DIVISION**

20
21 IN RE: SOCIAL MEDIA ADOLESCENT
22 ADDICTION/PERSONAL INJURY PRODUCTS
23 LIABILITY LITIGATION

24 THIS FILING RELATES TO:

25 ALL ACTIONS

26 MDL No. 3047

27 Case No. 4:22-md-03047-YGR (PHK)

28 Honorable Peter H. Kang

1
2 **STIPULATION REGARDING**
3 **DESIGNATION OF CONFIDENTIAL**
4 **MATERIALS IN RE-PRODUCTION**
5 **DOCUMENTS**

1 Plaintiffs, Defendants Meta Platforms, Inc.; Facebook Holdings, LLC; Facebook Orations, LLC;
 2 Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; and Siculus, Inc. (collectively,
 3 “Meta”), and Defendants TikTok Inc. and ByteDance, Inc. (collectively “TikTok”) submit this Joint
 4 Stipulation Regarding Designation of Confidential Materials in Re-Production Documents (“Stipulation
 5 on Confidentiality Designations”).

6 WHEREAS, on September 20, 2023 the Parties submitted letter-briefing [Dkt. No. 364] regarding
 7 a dispute over the timing for certain Defendants to apply confidentiality designations to documents
 8 previously re-produced in this litigation pursuant to the Court’s Order dated December 29, 2022 [Dkt. No.
 9 125];

10 WHEREAS, on November 22, 2023 the Court (Magistrate Judge Kang) set a hybrid discovery
 11 hearing for December 14, 2023 to hear the dispute presented at Dkt. No. 364 (along with two other
 12 disputes);

13 WHEREAS, the Parties have now reached an agreement that resolves the dispute over the timing
 14 for certain Defendants to apply confidentiality designations presented at Dkt. No. 364. Under the
 15 agreement, Defendants Meta and TikTok will re-produce the documents originally produced in response
 16 to the Court’s December 29, 2022 Order with confidentiality designations applied in accordance with the
 17 Protective Order appearing at Dkt. No. 290. In addition, Meta and TikTok will, in accordance with that
 18 Protective Order [Dkt. No. 290], apply confidentiality designations to any forthcoming updates to prior
 19 re-productions they have agreed to make, consistent with the Court’s December 29, 2022 Order; and

20 THEREFORE, the Parties notify the Court that the dispute briefed at Dkt. No. 364 is moot and
 21 need not be heard at the December 14, 2023 hybrid discovery hearing before Magistrate Judge Kang.

22
 23 DATED: December 11, 2023

Respectfully submitted,

24
 25 **COVINGTON & BURLING LLP**

26
 27 */s/ Ashley M. Simonsen*
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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: December 11, 2023

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen